

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DAVID MACK, and	)	
CHRISTOPHER MACK, on behalf of	)	1:10-cv-4244
themselves and others similarly situated,	)	
Plaintiffs,	)	Judge Hibbler
v.	)	Magistrate Judge Keys
	)	
MRS ASSOCIATES, INC.,	)	JURY TRIAL DEMANDED
Defendant.	)	

**PARTIES' PROPOSED DISCOVERY PLAN**

The parties hereby jointly submit the following proposed discovery plan:

Rule 26(a)(1) disclosures: October 1, 2010.

Amendments of pleadings: January 28, 2011.

Close of fact discovery: May 27, 2011.

Rule 26(a)(2) Expert Report Disclosure Schedule:

Last permissible date for disclosure of party  
with burden of proof as to expert issues presented: June 30, 2011;

Response: 45 days after service of initial 26(a)(2) disclosure;

Rebuttal: 30 days after service of response.

Respectfully submitted,

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